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18 *Plaintiffs' Interim Co-Lead Class Counsel*

19 *Additional Counsel Listed on the Signature Page*

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

1 JOHN PRUTSMAN, AMIRA MARTZ,  
2 SIMCHA RINGEL, NAIOMI MARDEN,  
3 ALANA BALAGOT, CORINNE  
4 WARREN, SUNNY LAI, AND DAVID  
5 KLEIN, INDIVIDUALLY AND ON  
6 BEHALF OF ALL OTHERS SIMILARLY  
7 SITUATED,

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9 PLAINTIFFS,  
10 VS.

11 NONSTOP ADMINISTRATION AND  
12 INSURANCE SERVICES, INC.,  
13 INCLUSIVE,

14 DEFENDANT.

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**CASE NO. 3:23-CV-01131-RFL**

**STIPULATION RE: PROPOSED  
EXTENSION OF TIME TO FILE MOTION  
FOR PRELIMINARY APPROVAL OF CLASS  
ACTION SETTLEMENT AND STATUS  
UPDATE RE THIRD PARTY CLAIMS;  
[PROPOSED] ORDER**

Judge: Hon. Rita F. Lin

1 Plaintiffs John Prutsman, Amira Martz, Simcha Ringel, Naomi Marden, Alana Balagot,  
2 Corrine Warren Sunny Lai, and David Klein, (hereinafter “Plaintiffs”), and Defendant Nonstop  
3 Administration and Insurance Services, Inc., (hereinafter “Defendant” or “Nonstop”), collectively  
4 referred to as “the Parties”, hereby stipulate, subject to the Court’s agreement, to extend the  
5 deadline for Plaintiffs to file their Motion for Preliminary Approval of Class Action Settlement  
6 and for the Parties to file a status update regarding the third-party claims against Conor Fitzpatrick,  
7 and in support thereof state as follows:

8 WHEREAS, on June 6, 2024, the Parties conducted a full-day mediation before the well-  
9 respected mediator Bennet G. Picker of Stradley Ronan and after extensive negotiations,  
10 eventually reached a class wide settlement in principle;

11 WHEREAS, on June 27, 2024 the Parties filed a Joint Case Management Statement and  
12 Notice of Settlement and requested forty-five (45) days for Plaintiffs to file their Motion for  
13 Preliminary Approval (ECF No. 92) and on July 1, 2024 the Court vacated the Case Management  
14 Conference set for July 3, 2024 and further ordered that the deadline for Plaintiffs to file their  
15 Motion and a status update regarding the third-party claims against Conor Fitzpatrick be set for  
16 August 12, 2024 (ECF No. 93);

17 WHEREAS, the Parties have been mutually working together to finalize the settlement  
18 agreement and accompanying papers, and to select a settlement administrator to oversee the notice  
19 and claims procedure;

20 WHEREAS, the Parties require a brief extension of time to finalize the agreement and for  
21 Plaintiffs’ to draft their Motion for Preliminary Approval once the agreement has been finalized  
22 and the settlement administrator selected; and

23 WHEREAS, to preserve party and judicial resources, the Parties agree that the deadline for  
24 Plaintiffs to file their Motion and status update should be extended fourteen (14) days, subject to  
25 Court approval;

26 NOW THEREFORE, subject to the Court’s approval and Order, it is stipulated by and  
27 between the parties, through their respective counsel of record, that Plaintiffs’ deadline to file their  
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STIPULATION RE: PROPOSED EXTENSION OF TIME TO FILE MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION SETTLEMENT AND STATUS REPORT RE THIRD PARTY CLAIMS;  
[PROPOSED] ORDER

1 Motion for Preliminary Approval and the deadline for the Parties to file a status update regarding  
2 the third-party claims against Conor Fitzpatrick be enlarged by fourteen (14) days.

3 **IT IS SO STIPULATED.**

4 Dated: August 12, 2024

**COLE & VAN NOTE**

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6 By: /s/ Scott Edward Cole  
7 Scott Edward Cole, Esq.

8 Dated: August 12, 2024

**MILBERG COLEMAN BRYSON  
PHILLIPS GROSSMAN, PLLC**

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11 By: /s/ Gary M. Klinger  
12 Gary M. Klinger, Esq.

*Plaintiffs' Interim Co-Lead Class Counsel*

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Dated: August 12, 2024

**CIPRIANI & WERNER PC**

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By: /s/ Jill H. Fertel  
Jill H. Fertel, Esq.

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*Counsel for Defendant*

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STIPULATION RE: PROPOSED EXTENSION OF TIME TO FILE MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT AND STATUS REPORT RE THIRD PARTY CLAIMS; [PROPOSED] ORDER

## ORDER

**THE PARTIES HAVING STIPULATED, AND GOOD CAUSE APPEARING,** the Court hereby enters its Order extending Plaintiffs' deadline to file their Motion for Preliminary Approval and the deadline for the Parties to file a status update regarding the third-party claims against Conor Fitzpatrick be enlarged by fourteen (14) days, or on or before August 26, 2024.

## IT IS SO ORDERED.

Dated: \_\_\_\_\_, 2024

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Hon. Rita F. Lin  
United States District Court for the Northern  
District of California